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5 [Additional counsel listed below]

6 *Proposed Class Counsel*

7 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

9 KATHLEEN JORDAN, *et al.*, individually
and on behalf of all others similarly
10 situated,

11 Plaintiffs,

12 v.

13 ABSOLUTE DENTAL GROUP, LLC, and
JUDGE CONSULTING, INC.,

14 Defendants.

Case No. 2:25-cv-00986-JAD-DJA

15 **PLAINTIFFS' UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT WITH
DEFENDANT ABSOLUTE DENTAL
GROUP, LLC**

16 CLASS ACTION

17 Pursuant to Rule 23 of the Federal Rules of Civil Procedure, Plaintiffs,¹ individually and on
18 behalf of all similarly situated persons, move the Court for preliminary approval of the proposed
19 Class Action Settlement Agreement and Release (“Settlement Agreement” or “SA”) with
20 Defendant Absolute Dental Group, LLC (“Absolute Dental”), attached as **Exhibit 1**.

21 As set forth in the attached Memorandum in Support, the Court should find the proposed
22 Settlement is within the range of reasonableness necessary to grant preliminary approval pursuant
23 to Federal Rule of Civil Procedure 23(e) and enter the Preliminary Approval Order (SA, at Ex. C,

24 ¹ All capitalized terms in this motion have the same definition ascribed to them in the Settlement
25 Agreement. See SA, Section 1 (Definitions)

1 and separately submitted herewith): (i) granting preliminary approval of the Settlement; (ii)
 2 provisionally certifying the Settlement Class for settlement purposes; (iii) appointing the Plaintiffs
 3 as Class Representatives; (iv) appointing Andrew W. Ferich of Ahdoot & Wolfson, PC, Andrew E.
 4 Mize of Stranch, Jennings & Garvey PLLC, Jessica A. Wilkes of Federman & Sherwood, Mariya
 5 Weekes of Milberg LLC, and Nickolas J. Hagman of Cafferty Clobes Meriwether & Sprengel LLP
 6 as Class Counsel for the Settlement Class; (v) approving the form of the Notices and the Notice
 7 Program; (vi) approving the Claim Form and the claims process; (vii) appointing Epiq Class Action
 8 & Claims Solutions, Inc. as the Settlement Administrator; (viii) establishing the opt-out and
 9 objection procedures and deadlines; and (ix) scheduling a Final Approval Hearing at which time
 10 the Court will consider whether to grant Final Approval of the Settlement and the Application for
 11 Attorneys' Fee and Costs Award and Service Awards.

12 Dated: December 18, 2025

Respectfully submitted,

13 /s/
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48 ***Additional Plaintiffs' Counsel***

1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies that on December 18, 2025, a true and correct copy of the
3 above and foregoing was filed with the Clerk of Court via the Court's CM/ECF system for
4 electronic service on all counsel of record.

5 Dated: December 18, 2025

6 */s/ Andrew W. Ferich*
7 Andrew W. Ferich